

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

GENOA HEALTHCARE, LLC,

Plaintiff

V.

NISHI SONI, HIMANSHU PATEL,

And

SAI HEALTHWAY PHARMACY, LLC,

Defendants

§ Civil Action No. 5:21-cv-00361-DAE

§ § § § §

**UNOPPOSED MOTION TO EXTEND DEADLINE FOR DEFENDANTS HIMANSHU
PATEL AND SAI HEALTHWAY PHARMACY, LLC TO ANSWER
PLAINTIFF'S ORIGINAL COMPLAINT**

COME NOW, Defendants Himanshu Patel and SAI Healthway Pharmacy, LLC (“Healthway Defendants”) and file this *Unopposed Motion to Extend Deadline for Defendants Himanshu Patel and SAI Healthway Pharmacy, LLC to Answer Plaintiff’s Original Complaint* (“Motion to Extend”) and in support thereof, respectfully show the Court:

1. Plaintiff Genoa Healthcare, LLC (“Genoa”) filed Plaintiff’s Original Complaint [Dkt 1] (“Complaint”) on April 9, 2021.
2. The Summons was served on the Healthway Defendants on April 26, 2021. *See* Dkt. 3.
3. The deadline for the Healthway Defendants to answer or otherwise respond to the Complaint is May 17, 2021.
4. The Healthway Defendants only recently retained counsel. In order to fully investigate the allegations of the Complaint and any defenses the Healthway Defendants may have, counsel requires additional time to answer or otherwise respond to the Complaint. The Healthway

Defendants therefore respectfully request that their deadline to answer or respond to the Complaint be extended to **June 7, 2021**.

5. This extension is not sought for improper purposes or delay, but so that the Healthway Defendants' meritorious responses and defenses may be adequately presented. The Healthway Defendants do not believe that any parties will be prejudiced or inconvenienced by this extension. This is the first extension requested in this case.

6. The undersigned conferred via email with Mr. Allan Neighbors, counsel for Genoa. Mr. Neighbors indicated that Genoa does not oppose the requested extension.

WHEREFORE, PREMISES CONSIDERED, the Healthway Defendants pray that the Court enter an order extending their deadline to answer or otherwise respond to the Complaint to June 7, 2021, and for such other relief to which they may be entitled at law or equity.

Dated: May 14, 2021.

Respectfully submitted,

LANGLEY & BANACK, INC.
745 E Mulberry Ave Suite 700
San Antonio, TX 78212
(210) 736-6600
(210) 735-6889 (fax)

/s/ Natalie F. Wilson

Natalie F. Wilson
State Bar No. 24076779
nwilson@langleybanack.com
ERICA V. VALLADARES
State Bar No. 24045841
evalladares@langleybanack.com

**ATTORNEYS FOR DEFENDANTS
HIMANSHU PATEL AND
SAI HEALTHWAY PHARMACY, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2021, a true and correct copy of the above and foregoing instrument was served by the Court's electronic transmission facilities and by email on the parties listed below:

LITTLER MENDELSON, P.C.

Allan H. Neighbors (ANeighbors@Littler.com)
Craig Lauchner (CLauchner@Littler.com)

1301 McKinney Street, Suite 1900
Houston, Texas 77010

/s/ Natalie F. Wilson
NATALIE F. WILSON